

September 20, 2011

My name is Allen Anderson, Human Resources Manager, Jennie-O Turkey Store Benson Ave Plant in Willmar, Minnesota where we employ 325 employees at this location. Jennie-O Turkey Store prides itself on compliance with all aspects of employment law and understands the importance of laws governing union organizing. We are very concerned about the Department of Labor's proposed changes to the "advice exemption" of the LMRDA and its effort on both employers and employees.

Our employees are our most critical asset we have to the success of our organization. An important part of our responsibility as an employer is to develop benefit packages, sound policies and a work environment that provides employee engagement in both union and non-union workplaces. Compliance to the multitude of employment laws today is an absolute within our organization.

The proposed regulations fundamentally broaden the number and types of activities that would have to be reported under LMRDA. For more than 50 years, the Department of Labor has distinguished between "direct" and "indirect" contact with employees, requiring direct contacts to be reported and not requiring the same type of advice to be reported, including providing draft comments to an employer, training supervisors and drafting policies. This has served both employers and employees well. This proposed change will cause outside consultants whom we rely on to stop providing critical information on how to best comply with law. The proposal seriously hinders the attorney-client relationship by exposing privileged communications. These proposed changes will certainly result in limiting the information that employees receive with regards to making a well informed decision as to whether or not join a union in their workplace. This change fundamentally will weaken the entire process.

We urge you to reconsider these proposed changes to the advice exemption and continue with the current process which has served everyone very well for over 50 years.

Sincerely,

Allen L. Anderson
Jennie-O Turkey Store, Benson Ave